

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT COURT OF WISCONSIN**

SANGER POWERS, ROBERT LEGG, )  
JENNIFER McCREARY, BETTY OWEN, )  
And LYDIA POSTOLOWSKI, )  
individually and on behalf of all others )  
similarly situated, )

Plaintiffs, )

v. )

FILTERS FAST, LLC, a North Carolina )  
corporation, )

Defendant. )

Case No. 3:20-cv-00982-jdp

**PLAINTIFFS' UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL OF THE CLASS ACTION SETTLEMENT**

Pursuant to Federal Rule of Civil Procedure 23(e), Plaintiffs Sanger Powers, Robert Legg, Jennifer McCreary, Betty Owen, and Lydia Postolowski, individually and on behalf of all others similarly situated (collectively, "Plaintiffs") respectfully move this Court for the entry of the proposed Preliminary Approval Order submitted herewith, which seeks the preliminary approval of a proposed class action settlement (the "Settlement") and certification of a proposed settlement class (the "Settlement Class") as defined therein. In support of this request, Plaintiffs state and present the following:

1. The terms of the Settlement are set forth in the Settlement Agreement and Release dated June 15, 2021, attached as Exhibit 1 to Plaintiffs' Memorandum of Law in Support of Their Unopposed Motion for Preliminary Approval of the Class Action Settlement (the "Memorandum"), filed contemporaneously herewith.

2. The relief sought in this Motion is supported by: the Declaration of William B. Federman, attached as Exhibit 2 to the Memorandum; and Plaintiffs' Memorandum of Law in Support of Their Unopposed Motion for Preliminary Approval of the Class Action Settlement.

3. Defendant, Filters Fast, LLC does not oppose the relief requested in this Motion.

WHEREFORE, Plaintiffs respectfully request that the Court enter the proposed Order Conditionally Certifying a Settlement Class, Granting Preliminary Approval of the Class Action Settlement, Approving the Form and Manner of Notice, and Scheduling a Final Approval Hearing.

Dated: July 2, 2021

Respectfully submitted,

/s/William B. Federman

William B. Federman, *admitted pro hac vice*

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*Counsel for Plaintiffs and the Putative Class*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 2, 2021, the foregoing document was filed via the Court's ECF system, which will cause a true and correct copy of the same to be served electronically on the following ECF-registered counsel of record.

/s/ William B. Federman

William B. Federman